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PRANGE LAW GROUP, LLC

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Attorneys for Defendant

Kinsale Insurance Company

IN THE UNITED STATES DISTRICT COURT

DISTRICT OF OREGON

PORTLAND DIVISION

**ZURICH AMERICAN INSURANCE
COMPANY,**

Plaintiff,

v.

KINSALE INSURANCE COMAPNY,

Defendant.

Case No.

NOTICE OF REMOVAL

TO THE CLERK OF COURT:

Please take notice that, pursuant to 28 U.S.C. §§ 1441 and 1446, defendant KINSALE INSURANCE COMPANY (“Kinsale”), by and through its counsel, Prange Law Group, LLC, hereby removes to this Court the case now pending in Multnomah County Circuit Court as

Zurich American Insurance Company v. Kinsale Insurance Company, with case number 17cv21515. In support of removal, Kinsale states as follows:

GROUNDS FOR REMOVAL

1. This Notice of Removal is timely filed under 28 U.S.C. § 1446 (b). Plaintiff, Zurich American Insurance Company (“Zurich”), filed this contribution and insurance coverage action on May 26, 2017, Case No. 17cv21515, in the Circuit Court of the State of Oregon for the County of Multnomah. Zurich served the summons and complaint from this case upon defendant on June 9, 2017, pursuant to ORS 735.490. Kinsale has filed this Notice of Removal within thirty days of plaintiff’s service of summons and complaint.

2. This Court has diversity jurisdiction over this case. This is a civil action over which this Court has original jurisdiction under 28 U.S.C. §1332(a) because the action involves a controversy between “citizens of different States” and because the amount in controversy exceeds \$75,000, exclusive of interest, costs and attorneys’ fees.

3. There is complete diversity between the parties. Zurich is a New York corporation with its principal place of business in Illinois. Kinsale is an Arkansas Corporation with its principal place of business in Richmond, Virginia.

4. The amount in controversy in this lawsuit, exclusive of interest, costs, and attorneys’ fees, is over the statutory minimum of \$75,000.

5. Removal to this district and division is proper. All state court pleadings are attached as Exhibit 1. No further proceedings have been filed in the Multnomah County Circuit Court as of the date of this removal.

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Kinsale is providing Zurich, through its counsel, with written notice of the filing of this Notice of Removal. Kinsale is also filing a copy of this Notice of Removal with the Clerk of the Circuit Court of Multnomah County, Oregon, where the state court action was filed.

DATED: July 7, 2017.

Respectfully submitted,

PRANGE LAW GROUP, LLC

By: /s/Aaron C. Denton
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Attorneys for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that I served a full, true, and correct copy of the foregoing NOTICE OF REMOVAL by U.S. Mail, electronic mail, via Outlook, and electronically, using CM/ECF, addressed to the following named persons at their last known address:

George Shumsky
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